

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

DAVID D. HENWOOD, :
 :
 Plaintiff, :
 :
 v. : Civil Action No.
 : 3:01 CV 996 (AWT)(DFM)
 :
 UNISOURCE WORLDWIDE, INC. and :
 GEORGIA-PACIFIC CORP. :
 :
 Defendants. : January 8, 2004

MOTION TO SEAL

Pursuant to Local Civil Rule 5(d) of the Local Civil Rules for the United States District Court for the District of Connecticut, the Plaintiff respectfully requests that the Court seal in the attached envelope the following documents filed in Plaintiff David Henwood's Summary Judgment Exhibits, dated January 8, 2004:

1. O'Toole Exhibit 1, located at Exhibit Tab 2 - February 19, 1999 Announcement
2. O'Toole Exhibit 26, located at Exhibit Tab 2 - Paper Corp. Employee Profile
3. Lindem Exhibit 10, located at Exhibit Tab 7 - November 3, 1999 Memo
4. Beaudoin Exhibit 9, located at Exhibit Tab 10 - November 3, 1999 Memo

These four documents were stamped "CONFIDENTIAL" by the Defendants prior to being produced to the Plaintiffs in discovery. Although the parties discussed entering into a confidentiality agreement that would govern how "CONFIDENTIAL" documents would be treated, to date they have not executed any such agreement. Nonetheless, the Plaintiff requests that the Court seal these four documents (copies of which are enclosed for ease of identification) without prejudice to either parties' right to challenge the confidential nature of them at a later date.

RESPECTFULLY SUBMITTED,
THE PLAINTIFF,
DAVID D. HENWOOD

By _____/s/_____
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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing was sent by U.S. Mail, postage prepaid, to the following counsel of record on this 8th day of January 2004:

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_____/s/_____
Daniel M. Young